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Reply to: Stamford Office

29 November 2017

VIA ECF

Honorable Lorna G. Schofield
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: MPI Tech A/S v. International Business Machines Corporation
Docket No. 15-cv-4891-LGS-DCF

Dear Judge Schofield:

I write on behalf of Plaintiff MPI Tech, Defendant IBM, and former counsel for MPI, Marc Goldstein, Esq., all concerned parties in this action ("Parties"), with regard to Your Honor's Order dated October 12, 2017 (D.E. 294) ("Order"), in which the Court extended certain filing deadlines (the "Deadlines") to November 30, 2017, and December 13, 2017. The Parties now write jointly to respectfully request a one-week extension of the Deadlines.

Pursuant to Your Honor's Individual Rules, I(B)(2), we provide the following information: (1) the current Deadlines are November 30 and December 13, 2017, and the extensions sought are December 7 and December 21, 2017; (2) this is the fourth request for extension of these deadlines; (3) the prior requests for extension have been granted by the Court; and (4) all Parties consent to the relief requested. The extension of the Deadlines requested herein will not affect any other dates or deadlines in this matter.

We thank the Court for its patience as we seek to resolve this matter without Court intervention. Thank you for your consideration.

Respectfully,

A handwritten signature in black ink, reading 'Matthew C. Wagner'.

Matthew C. Wagner

CC: Jonathan D. Cogan, Esq., counsel for IBM (Jonathan.Cogan@kobrekim.com)
Marc Goldstein, Esq. (goldstein@lexmarc.us)

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